

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

_____)	
UNITED STATES OF AMERICA)	
)	
)	
v.)	Criminal No. 05-10102-JLT
)	
)	
JOHN BRUENS, MARY STEWART, MARC)	
SIROCKMAN, MELISSA VAUGHN)	
)	
Defendants.)	
_____)	

GOVERNMENT'S MOTION FOR EXTENSION OF TIME TO
RESPOND TO DOCKET NOS. 95, 97, 98, 99 AND 101

Now comes the United States of America, by its attorney, Michael J. Sullivan, United States Attorney for the District of Massachusetts, and respectfully requests the Court to extend the period of time in which to respond to various motions filed by the defendants. Specifically, the government requests a 48-hour extension, until Wednesday, April 4, 2007, to respond to the motions docketed as # 95, 97, 98, 99 and 101.

As grounds for this motion, the government states that pursuant to the Court's order of January 16, 2007, the parties were required to file all motions *in limine* on or before March 22, 2007. To that end, the defendants, both individually and jointly, filed a total of 9 such motions. The government did not file any motion. In its Order of January 16, 2007, the Court set a response date for filing oppositions to the motions by April 2,

2007.

The government requests additional time to respond to the following motions:

Docket No. 95: Motion of Melissa Vaughn to Redact Voicemail;

Docket No. 97: Motion of Mary Stewart to Exclude Brutonized Statement and Renewal of Motion for Separate Trial;

Docket No. 98: Motion of Mary Stewart to Exclude Hearsay Statement of Kimberly Jackson;

Docket No. 99: Defendants' Joint Motion to Exclude a Portion of Mary Stewart's Statement; and

Docket No. 101: Defendants' Joint Motion to Admit Grand Jury Testimony of Dr. Howard Grossman.

Although counsel for the government has been working diligently on this case, including preparing and filing its responses to four of the nine motions, counsel has been unable to complete its oppositions to the above-referenced motions within the time set by the court (which was less than the two week period provided for in the Local Rules). An additional two days should not have any effect on the other dates set by the court, including the pretrial conference on April 12, 2007.

Accordingly, based on the foregoing, the government requests that its motion be granted and that the Court order that its response to the above-referenced motions be filed on or before

April 4, 2007.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ Susan M. Poswistilo
MARY ELIZABETH CARMODY
SUSAN M. POSWISTILO
Assistant U.S. Attorneys

CERTIFICATE OF SERVICE

I hereby certify that these documents filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

Dated: 04/02/2007

/s/ Susan M. Poswistilo
SUSAN M. POSWISTILO
Assistant United States Attorney